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**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF CALIFORNIA**

In re  
CREATIVE CAPITAL LEASING  
GROUP, LLC  
Bk. No.: 07-04977-LT11  
Chapter 11  
**RESPONSE OF CORPORATE  
RECOVERY ASSOCIATES TO THE  
COURTS TENTATIVE RULING ON  
THE FIFTH AND FINAL  
APPLICATION OF CORPORATE  
RECOVERY ASSOCIATES FOR  
COMPENSATION AND  
REIMBURSEMENT OF EXPENSES**  
Date: March 9, 2017  
Time: 9:30 a.m.  
Dept: 3  
Judge: Hon. Laura S. Taylor

In accordance with the Court’s tentative ruling, Corporate Recovery Associates (“Applicant”) submits concurrently herewith a proposed order allowing and authorizing payment of fees and costs of Applicant consistent with the Court’s tentative ruling.

1           Applicant respectfully requests that the Court enter such order.

2           By the Fifth and Final Application of Corporate Recovery Associates for  
3       Compensation and Reimbursement of Expenses (the “Application”), Applicant requested  
4       that the Court allow and authorize payment to Applicant of additional fees and costs that  
5       may be incurred by Applicant associated with the winding up and the closing of this case  
6       in an amount not to exceed \$7,000.00 (“Supplemental Fees and Costs”). Through  
7       inadvertence, however, the notice of the hearing on the Application (the “Notice”) did not  
8       disclose Applicant’s request for the Supplemental Fees and Costs. By reason of the failure  
9       to disclose the request for the Supplemental Fees and Costs in the Notice, by the Court’s  
10      tentative ruling, the Court indicated its intention to deny the request for the Supplemental  
11      Fees and Costs.

12           Applicant respectfully requests that the Court reconsider its tentative ruling  
13       regarding Applicant’s Supplemental Fees and Costs and instead authorize Applicant to  
14       seek allowance and payment of the Supplemental Fees and Costs by Applicant’s serving  
15       an amended notice that will disclose properly Applicant’s request for the Supplemental  
16       Fees and Costs in accordance with the following procedures:

- 20           1.     Applicant will serve on all parties entitled to receive notice a copy of  
21               the amended notice disclosing the request for payment of the  
22               Supplemental Fees and Costs.
- 23           2.     In the event that no objection to the request for payment of the  
24               Supplemental Fees and Costs is filed within fourteen days of service of  
25               the amended notice, Applicant may file a declaration of non-opposition  
26               and a proposed order allowing and authorizing payment of the

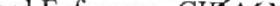
Supplemental Fees and Costs, with no need for any further notice or hearing before the Court.

3. If an objection to the request for the Supplemental Fees and Costs is timely filed, Applicant will set the matter for hearing before the Court.

Applicant respectfully submits that the proposed procedures are fair and provide to all parties-in-interest an adequate opportunity to assert any objection to Applicant's Supplemental Fees and Costs.

Respectfully submitted this 8<sup>th</sup> day of March 2017

CORPORATE RECOVERY ASSOCIATES

BY:   
Richard Fefferman, CIBA MAFF

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ATTORNEY OR PARTY WITHOUT ATTORNEY (Name and Address):  Jeffrey D. Cawdrey, Esq. (SBN: 120488) GORDON & REES, LLP 101 West Broadway, Suite 2000 San Diego, California 92101		Telephone No. (619) 696-6700
In Re Creative Capital Leasing Group, LLC		Bankruptcy Case No.: 07-04977-PB7
ATTORNEYS FOR Leslie T. Gladstone, Chapter 7 Trustee		

### **PROOF OF SERVICE**

I, the undersigned, say: I am over 18 years of age, employed in the County of Dallas, Texas, in which the within-mentioned service occurred; and that I am not a party to the subject cause. My business address is 2100 Ross Avenue, Suite 2800, Dallas, Texas 75201.

On **March 8, 2017**, I served the following document(s):

#### **RESPONSE OF CORPORATE RECOVERY TO THE COURT'S TENTATIVE RULING ON THE FIFTH AND FINAL APPLICATION OF CORPORATE RECOVERY ASSOCIATES**

by the following means:

#### **SEE SERVICE LIST**

- BY MAIL. I am familiar with this firm's practice of collection and processing correspondence for mailing with the United States Postal Service, and that the correspondence shall be deposited with the United States Postal Service this same day in the ordinary course of business pursuant to Code of Civil Procedure §1013a.
- BY FAX. In addition to service by mail as set forth above, a copy of said document(s) were also delivered by facsimile transmission to the addressee pursuant to Code of Civil Procedure §1013(e).
- BY PERSONAL SERVICE. I caused said documents to be hand-delivered to the addressee pursuant to Code of Civil Procedure §1011.
- BY FEDERAL EXPRESS. I deposited said document(s) in a box or other facility regularly maintained by the express service carrier providing overnight delivery pursuant to Code of Civil Procedure §1013(c).
- BY ECF: I caused all of the pages of the above-entitled document(s) to be electronically filed and served on designated recipients through the Electronic Case Filing system for the above-entitled case. The file transmission was reported as successful and a copy of the Electronic Case Filing Receipt will be maintained with the original document(s) in our office...

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on **March 8, 2017**.

/s/Denise Houser  
Denise Houser

**SERVICE LIST****07-04977-LT7 Notice was electronically sent to:**

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